1	Laura Marquez-Garrett (SBN 221542)		
2	Laura@socialmediavictims.org Matthew P. Bergman		
3	matt@socialmediavictims.org Glenn S. Draper		
4	glenn@socialmediavictims.org SOCIAL MEDIA VICTIMS LAW CENTER		
5	600 1st Ave, Ste 102 - PMB 2383		
6	Seattle, WA 98104 Telephone: (206) 741-4862		
7	Attorneys for Plaintiffs		
8	[Additional counsel listed on signature page]		
9	UNITED STATES DISTRICT COURT		
10	NORTHERN DISTRICT OF CALIFORNIA		
11	OAKLAND DIVISION		
12	Alilah Fernandez,	CASE NO. 4:23-cv-06128-YGR	
13	Plaintiff,	MDL NO. 4:22-md-03047	
14	·	PLAINTIFF ALILAH FERNANDEZ'S	
15	VS.	NOTICE OF LEXECON OBJECTION	
16	Meta Platforms, Inc., et al.		
17	Defendants.		
18			
19			
20	NOTICE IS HEREBY GIVEN THAT, in accordance with Case Management Order		
21	No. 13 (MDL 3047, ECF No. 780), plaintiff Alilah Fernandez ("Plaintiff") hereby asserts		
22	her right with respect to the jurisdiction of this Court for purposes of trial and objects to such		
23 24	jurisdiction pursuant to Lexecon, Inc. v. Milberg Weiss Bershad Hynes & Lerach, 523 U.S.		
25	26 (1998). As stated in Plaintiff's complaint, the complaint is deemed to have been filed in		
26	the United States District Court for the Eastern District of New York. See Case No. 4:23-cv-		
27	06128 FCF No. 1: see also CMO 4. 8 II D (MDI, 3047, FCF No. 119) ("At the completion		

1	of all pretrial proceedings this Court shall transfer such cases to the federal district court	
2	identified by the Plaintiff").	
3	DATED this 13th day of May, 2024.	
4		SOCIAL MEDIA VICTIMS LAW CENTER PLLC
5		By: /s/ Laura Marquez-Garrett
6		Laura Marquez-Garrett
7		Laura Marquez-Garrett (SBN 221542)
8		Laura@socialmediavictims.org Matthew P. Bergman
9		matt@socialmediavictims.org Glenn S. Draper
10		glenn@socialmediavictims.org
		SOCIAL MEDIA VICTIMS LAW CENTER
11		600 1st Ave, Ste 102 - PMB 2383 Seattle, WA 98104
12		Telephone: (206) 741-4862
13		
13		Christopher A. Seeger
14		cseeger@seegerweiss.com
15		Christopher Ayers
13		cayers@seegerweiss.com Jennifer Scullion
16		jscullion@seegerweiss.com
17	 	SEEGER WEISS LLP
1 /		55 Challenger Road
18		Ridgefield Park, NJ 07660
10		Telephone: 973-639-9100
19		Facsimile: 973-679-8656
20		Robert H. Klonoff
21		klonoff@usa.net
22		ROBERT KLONOFF, LLC 2425 S.W. 76 th Ave.
		Portland, Oregon 97225
23		Telephone: (503) 702-0218
24		Facsimile: (503) 768-6671
25		Attorneys for Plaintiff
26		
27		
28		